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April 12, 2024

Via Electronic Filing

The Honorable Robert M. Levy, U.S.M.J.
U.S. District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Torres v. Maman Group New York Corp. et al*
Case No.: 1:22-cv-05029-LDH-RML

Dear Honorable Magistrate Judge Levy:

This law firm is counsel to Plaintiffs Alejandro Torres and Michael Williams Garcia, Jr. (together, the “Plaintiffs”) in the above-referenced matter. The following letter is submitted jointly with counsel for Defendants Maman Group New York Corp. and Maman Tribeca, LLC (together, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rules, this joint letter respectfully serves to request an extension of time to complete fact discovery from April 16, 2024 to, through and including, May 16, 2024. This is the sixth request of its kind. [See Dckt. Nos. 20, 23, 24, 25, 26]. If granted, this request would also necessitate an adjournment of the telephonic status conference scheduled for April 29, 2024 to a date and time after May 16, 2024. The basis of this request is that the parties require additional time to complete paper discovery and depositions. The parties anticipate being in a position to complete all discovery on or before May 16, 2024.

A second, independent basis also necessitates the instant request. The parties are also continuing to explore the possibility of a global resolution of this action. If a global settlement is possible, the parties wish to conserve resources, before taking on the additional expenses of completing depositions.

In light of the foregoing, it is respectfully requested that the Court extend the parties’ time to complete fact discovery from April 16, 2024 to, through and including, May 16, 2024, and adjourn the telephonic status conference scheduled for April 29, 2024 to a date and time after May 16, 2024.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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Via ECF: All Counsel